

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :  
RICHARD ALVER COON, F/D/B/A : CHAPTER 13  
COON RENTALS, F/D/B/A :  
D&K RENTALS, F/D/B/A :  
DICK COON REAL ESTATE SERVICES :  
and ELIZABETH KAREN COON, :  
F/D/B/A COON & COMPANY, :  
Debtors :  
 :  
JACK N. ZAHAROPOULOS, :  
STANDING CHAPTER 13 TRUSTEE, :  
Movant :  
 :  
vs. :  
 :  
RICHARD ALVER COON, F/D/B/A :  
COON RENTALS, F/D/B/A :  
D&K RENTALS, F/D/B/A :  
DICK COON REAL ESTATE SERVICES :  
and ELIZABETH KAREN COON, :  
F/D/B/A COON & COMPANY, :  
Respondents : CASE NO. 1-24-bk-03246-HWV

TRUSTEE'S OBJECTION TO FIRST AMENDED CHAPTER 13 PLAN

AND NOW, this 21<sup>st</sup> day of July 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Douglas R. Roeder, Esquire, and objects to the confirmation of the above-referenced Debtors' Plan for the following reason:

1. Debtors' Plan violates 11 U.S.C. § 1322(a)(1) and § 1325(b) in that Debtors have not submitted all or such portion of the disposable income to Trustee as required. More specifically,

Trustee alleges, and therefore avers, that Debtors' disposable income is greater than that of which is committed to the Plan based upon disposable income on Schedules I and J and specifically disputes the following amount:

a. Excess disposable income.

WHEREFORE, Trustee alleges and avers that Debtors' Plan cannot be confirmed, and therefore, Trustee prays that this Honorable Court will:

- a. deny confirmation of Debtors' Plan;
- b. dismiss or convert Debtors' case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/ Douglas R. Roeder, Esquire  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 21<sup>st</sup> day of July 2025, I hereby certify that I have served the within Objection by electronically notifying all parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Kara K. Gendron, Esquire  
Mott & Gendron Law  
125 State Street  
Harrisburg, PA 17101

/s/ Derek M. Stroupbauer, Paralegal  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee